

KOVAR

V.

GMRI, INC, d/b/a THE OLIVE GARDEN ITALIAN RESTAURANTS

CASE NO. A-20-820490-C

**NOTICE OF REMOVAL OF ACTION  
UNDER 28 U.S.C. § 1441 (DIVERSITY)**

**Exhibit B  
State Court Notice of Removal**

1 NOTC  
2 JOSH COLE AICKLEN  
3 Nevada Bar No. 007254  
4 [Josh.aicklen@lewisbrisbois.com](mailto:Josh.aicklen@lewisbrisbois.com)  
5 PAUL A. SHPIRT  
6 Nevada Bar No. 10441  
7 [Paul.shpirt@lewisbrisbois.com](mailto:Paul.shpirt@lewisbrisbois.com)  
8 JENNIFER R. LANAHAN  
9 Nevada Bar No. 14561  
10 [Jennifer.lanahan@lewisbrisbois.com](mailto:Jennifer.lanahan@lewisbrisbois.com)  
11 LEWIS BRISBOIS BISGAARD & SMITH LLP  
12 6385 S. Rainbow Boulevard, Suite 600  
13 Las Vegas, Nevada 89118  
14 702.893.3383  
15 FAX: 702.893.3789  
16 Attorneys for Defendant GMRI, INC. d/b/a  
17 THE OLIVE GARDEN ITALIAN  
18 RESTAURANT

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20  
21 DISTRICT COURT  
22 CLARK COUNTY, NEVADA

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24 RACHEL W. KOVAR,  
25 Plaintiffs,  
26 vs.

27 CASE NO. A-20-820490-C  
28 Dept. No.: XXX

29 NOTICE OF REMOVAL OF ACTION

30 GMRI, INC. d/b/a THE OLIVE GARDEN  
31 ITALIAN RESTAURANT, a Florida  
32 foreign corporation; DOE Individuals I  
33 through X; and ROE Corporations and  
34 Organizations I through V, inclusive,  
35 Defendants.

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37 TO: THE CLERK OF THE COURT:

38 PLEASE TAKE NOTICE that on September 30, 2020, Defendant GMRI, INC. d/b/a  
39 THE OLIVE GARDEN ITALIAN RESTAURANT (“GMRI”), by and through its attorneys of  
40 record, Josh Cole Aicklen, Esq. and Paul A. Shpirt, Esq. of LEWIS BRISBOIS  
41 BISGAARD & SMITH, removed this action to the Federal District Court, Southern

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1 Division, all as stated in the copy of the Notice of Removal and Exhibits thereto which are  
2 collectively attached to this Notice as **Exhibit "A."**

3 DATED this 30<sup>th</sup> day of September, 2020

4 Respectfully submitted,

5  
6 LEWIS BRISBOIS BISGAARD & SMITH LLP

7 By  
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9 JOSH COLE AICKLEN  
10 Nevada Bar No. 007254  
11 PAUL A. SHPIRT  
12 Nevada Bar No. 10441  
13 JENNIFER R. LANAHAN  
14 Nevada Bar No. 14561  
15 6385 S. Rainbow Boulevard, Suite 600  
16 Las Vegas, Nevada 89118  
17 Tel. 702.893.3383  
18 Attorneys for Defendant GMRI, INC. d/b/a  
19 THE OLIVE GARDEN ITALIAN  
20 RESTAURANT

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 30th day of September, 2020, a true and correct copy  
3 of **NOTICE OF REMOVAL OF ACTION** was served electronically with the Court using  
4 the Electronic Service system and addressed as follows:

5 TIMOTHY R. O'REILLY, ESQ.  
6 Nevada Bar No. 8866  
7 O'REILLY LAW GROUP, LLC  
8 325 S. Maryland Parkway  
Las Vegas, NV 89101  
702-382-2500  
[efile@oreillylawgroup.com](mailto:efile@oreillylawgroup.com)

9 GERALD I. GILLOCK, ESQ.  
10 Nevada Bar No. 51  
GERALD I. GILLOCK & ASSOCIATES  
11 428 South Fourth Street  
Las Vegas, NV 89101  
702-386-0000  
[gilllock@gmk-law.com](mailto:gilllock@gmk-law.com)

12 SAMUEL MIREJOVSKY, ESQ.  
13 Nevada Bar No. 13919  
ASHLEY M. WATKINS, ESQ.  
14 Nevada Bar No. 13981  
SAM & ASH, LLP  
15 1108 S. Casino Center  
Las Vegas, NV 89104  
702-820-4000

16 *Attorneys for Plaintiff*

17  
18 By /s/Tina M. Abrante

19  
20 An Employee of  
21 LEWIS BRISBOIS BISGAARD & SMITH LLP  
22  
23  
24  
25  
26  
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